

1 HONORABLE JAMES L. ROBART  
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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 NATIONAL PRODUCTS INC.,

10 Plaintiff,

11 v.

12 ARKON RESOURCES, INC.,

13 Defendant.

15 NATIONAL PRODUCTS INC.,

16 Plaintiff,

17 v.

18 HIGH GEAR SPECIALTIES INC.,

19 Defendant.

20 NATIONAL PRODUCTS INC.,

21 Plaintiff,

22 v.

23 WIRELESS ACCESSORY SOLUTIONS,  
LLC, d/b/a IBOLT – WIRELESS  
ACCESSORY SOLUTIONS, LLC,

25 Defendant.

CONSOLIDATED CASE

Lead Case No. 2:15-cv-01984-JLR

STIPULATED MOTION AND ~~PROPOSED~~  
ORDER FOR REVISED DISCOVERY  
SCHEDULE

NOTE ON MOTION CALENDAR:  
March 1, 2018

Case No. 2:15-cv-01985-JLR

JURY TRIAL DEMANDED

Case No. 2:15-cv-02024-JLR

JURY TRIAL DEMANDED

28 STIP. MTN. FOR REVISED  
DISCOVERY SCHEDULE

Case Nos. 2:15-cv-01984-JLR,  
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,  
2:16-cv-00109-JLR

- 1 -

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1 NATIONAL PRODUCTS INC.,  
 2 Plaintiff,  
 3 v.  
 4 BRACKETRON, INC.  
 5 Defendant.

Case No. 2:16-cv-00109-JLR

## JURY TRIAL DEMANDED

7 Pursuant to the Court's October 23, 2017 Order for Revised Schedule (Dkt. No. 105),  
 8 plaintiff National Products Inc. ("NPI") and defendants Arkon Resources, Inc. ("Arkon"), High  
 9 Gear Specialties Inc. ("High Gear"), Wireless Accessory Solutions, LLC, d/b/a IBOLT –  
 10 Wireless Accessory Solutions, LLC ("IBOLT"), and Bracketron, Inc. ("Bracketron")  
 11 (collectively, "Defendants") jointly submit the following revised proposed schedule to govern  
 12 the above-captioned matters.

13 The parties ask that the Court enter the following schedule of deadlines:

Event	Current Schedule (Dkt. No. 105)	Parties' Proposal
Noting date for all motions related to discovery, pursuant to LCR 7(d)(3) or LCR 37(a)(2)	March 29, 2018	May 11, 2018
Discovery Completion	April 6, 2018	May 18, 2018

21 Good cause exists to modify the current schedule. Under the current schedule, the  
 22 deadline to complete depositions and all other remaining discovery is in just over five weeks, on  
 23 April 6, 2018. Coordination of counsel and witness schedules, particularly for the multiple  
 24 expert witness depositions, has been made extremely difficult by trial and other extended  
 25 obligations of counsel. Accordingly, due to the condensed schedule and the parties' scheduling  
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1 conflicts in the upcoming weeks, the parties believe that good cause exists to modify the current  
2 schedule as provided above.

3 Dated: March 1, 2018

Respectfully submitted,

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13 Attorney for Plaintiff  
14 National Products Inc.

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1 Dated: March 1, 2018

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18 Inc.; Wireless Accessory Solutions, LLC, d/b/a  
19 iBolt – Wireless Accessory Solutions, LLC; and  
20 High Gear Specialties, Inc.*

21 Dated: March 1, 2018

Respectfully submitted,

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27 Bracketron, Inc.*

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## ORDER

This matter is before the Court on the parties' Stipulated Motion for Revised Schedule.

The Court, having considered this matter and the record in this case, ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Noting date for all motions related to discovery, pursuant to LCR 7(d)(3) or LCR 37(a)(2)	May 11, 2018
Discovery Completion	May 18, 2018

SO ORDERED this 1<sup>st</sup> day of March, 2018.

HONORABLE JAMES L. ROBART  
UNITED STATES DISTRICT JUDGE

STIP. MTN. FOR REVISED  
DISCOVERY SCHEDULE  
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22 Attorneys for Defendants Arkon Resources, Inc.;  
23 Wireless Accessory Solutions, LLC, d/b/a iBolt –  
24 Wireless Accessory Solutions, LLC; and  
High Gear Specialties Inc.

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CERTIFICATE OF SERVICE

2 I, Kathy Meyer, hereby certify that on March 1, 2018, I caused the foregoing  
 3 **STIPULATED MOTION AND [PROPOSED] ORDER FOR REVISED DISCOVERY**  
 4 **SCHEDULE** to be served on the following parties as indicated below:

<p>6 James E. Breitenbucher (WSBA No. 27670)    FOX ROTHSCHILD LLP    7 1001 Fourth Avenue, Suite 4500    Seattle, WA 98154-1065</p> <p>8    9 <i>Attorneys for Defendants Arkon Resources, Inc.;</i>  <i>10 Attorneys For Defendant Wireless Accessory</i>  <i>Solutions, LLC, d/b/a iBolt – Wireless Accessory</i>  <i>Solutions, LLC</i></p> <p>11 <i>Attorneys for Defendant</i>  <i>12 High Gear Specialties Inc.</i></p>	<p>[ ] By United States Mail    [ ] By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>    [ ] By Overnight Express Mail    [ ] By Facsimile    [ ] By Email  <a href="mailto:jbreitenbucher@foxrothschild.com">jbreitenbucher@foxrothschild.com</a></p>
<p>13 Marc A. Karish (admitted <i>pro hac vice</i>)    KARISH &amp; BJORGUM, PC    14 119 E. Union Street, Suite B    Pasadena, CA 91103</p> <p>15    16 <i>Attorneys for Defendants Arkon Resources, Inc.;</i>  <i>17 Attorneys For Defendant Wireless Accessory</i>  <i>Solutions, LLC, d/b/a iBolt – Wireless Accessory</i>  <i>Solutions, LLC</i></p> <p>18 <i>Attorneys for Defendant</i>  <i>High Gear Specialties Inc.</i></p>	<p>[ ] By United States Mail    [ ] By Legal Messenger  <input checked="" type="checkbox"/> <b>By Electronic CM/ECF</b>    [ ] By Overnight Express Mail    [ ] By Facsimile    [ ] By Email  <a href="mailto:marc.karish@kb-ip.com">marc.karish@kb-ip.com</a></p>
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Dated: March 1, 2018

By: s/Kathy Meyer

For Jessica M. Kaempf, WSBA No. 51666  
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